

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ESPERANZA SANTOS	:	VIOLATIONS:
JOSE MEJILLIA-HERNANDEZ,	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a Jonathan Castro-Rondon	:	and possess with intent to distribute 5
	:	kilograms or more of cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 500 grams or more of
	:	cocaine - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about November 14, 2005 to on or about November 15, 2005,
in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

ESPERANZA SANTOS and
JOSE MEJILLIA-HERNANDEZ,
a/k/a Jonathan Castro Rondon,

conspired and agreed, together and with others known and unknown to the grand jury, to
knowingly and intentionally distribute, and possess with intent to distribute, 5 kilograms or more
of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants **ESPERANZA SANTOS** and **JOSE MEJILLIA-HERNANDEZ** agreed to sell approximately five kilograms of cocaine to a person known to the grand jury for \$22,000 per kilogram.

OVERT ACTS

In furtherance of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about November 14, 2005, during a recorded telephone call, defendant **ESPERANZA SANTOS** agreed to meet a person known to the grand jury (person #1) in Philadelphia the next day to conduct a cocaine transaction.

On or about November 15, 2005:

2. Defendants **ESPERANZA SANTOS** and **JOSE MEJILLIA-HERNANDEZ** met with person #1 in the area of 235 W. Duncannon Street in Philadelphia and discussed the sale and delivery of five kilograms of cocaine, in a transaction which would be brokered by defendant **SANTOS**.

3. At the direction of defendant **ESPERANZA SANTOS**, person #1 accompanied an unknown male inside a first floor apartment at 235 W. Duncannon Street, in Philadelphia where the unknown male showed person #1 two kilograms of cocaine.

4. Defendants **ESPERANZA SANTOS** and **JOSE MEJILLIA-HERNANDEZ** accompanied person #1 in his vehicle to the area of 5th and Fisher Streets in

Philadelphia, where defendant MEJILLIA-HERNANDEZ, who was in telephonic contact with the unknown male, stated that it would take one or two hours for him to arrange the delivery of an additional three kilograms of cocaine.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ESPERANZA SANTOS and
JOSE MEJILLIA-HERNANDEZ,
a/k/a Jonathan Castro Rondon,**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 500 grams or more, that is, approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendants

**ESPERANZA SANTOS and
JOSE MEJILLIA-HERNANDEZ,
a/k/a Jonathan Castro Rondon,**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property, subject to forfeiture, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property subject to

forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney